Dear Deputy Ambassador,

I write on behalf of the European Consumer Organisation (BEUC) in view of the Energy Council which will take place in Luxembourg on 11 June. Energy Ministers will discuss legislative files currently in trilogue negotiations, especially the Energy Efficiency Directive, Renewable Energy Directive and the Governance Regulation and we would like to share with you the following recommendations:

- **Deliver savings to consumers through an ambitious 2030 energy efficiency target**
  Ambitious energy efficiency policy will help consumers get their energy bills under control, keep their homes warm and healthy. It is therefore crucial to exploit the potential of energy efficiency by setting ambitious energy efficiency target for 2030. In this respect we encourage you to increase the Council’s ambition. While flexibility is important, all loopholes in energy savings schemes must be closed. In particular, the transport sector should be fully included in the calculation of energy saving obligations. Counting energy generated on-site from renewable sources towards a buildings’ energy savings should not be allowed.

- **Enable consumers to generate their own renewable electricity**
  The Renewable Energy Directive has the potential to empower consumers. This can really happen, however, only if household consumers are provided with a fair regulatory framework. Indeed, not all consumers are the same: household consumers do not have the levels of sophistication and resources of industrial customers; they will need an adequate framework to allow them to participate in the market at a level playing field. BEUC calls on you to endorse that at least household and small self-consumers receive a fair remuneration for the electricity they put into the system for at least the market price. Households should not be asked to pay charges and levies for an activity that happens within their premises. Moreover, those with less access to financing will be those in more need of support schemes, and hence those more affected by any charge or fee. Self-consumption should be a right made accessible for all categories of consumers, including those with lower income and tenants.
Solutions to end energy poverty exist
The fact is that nearly 11% of EU citizens are unable to adequately heat their homes. Despite the challenges this situation creates, solutions exist: Energy efficiency policy should steer energy efficiency measures towards consumers, to energy poor households as a priority. Renewable Energy Directive should help to make renewables accessible to all consumers, including those in vulnerable situations. And the Governance Regulation should improve the data comparability and the transferability of best practices in energy poverty across the EU. In this respect, we call on Member States to define a set of criteria to measure energy poverty in the energy market.

Thank you very much for taking our recommendations into account.

We remain at your disposal should you have any questions or wish to receive further feedback.

Yours faithfully,

Monika De Volder
Senior Economic Officer